



# CODE OF CONDUCT



**SCANIA**

**Please read this Code of Conduct thoroughly.**  
It will support you in your day-to-day work.

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# FOREWORD BY THE EXECUTIVE BOARD OF SCANIA CV AB

Dear colleagues,

Scania's success is based on our core values and our management system supported by our main principles, in particular our commitment to continuous improvement. This is the basis of our unique corporate culture and it gives us a strong leadership position in a world increasingly dependent on safe, sustainable and efficient transport systems. We call it "The Scania Way".

Scania's strategic direction is to drive the shift towards a sustainable transport system, creating a world of mobility that is better for business, society and the environment. While the core of our contribution to society is about the transformation of the transport system, it does not mean that our responsibility ends there. For Scania, sustainability is also about how we conduct our business– it is about being responsible and delivering value in our relationships and across our value chain. The more global we become, the more important it is to keep trust, transparency and ethics top of mind.

At Scania we always strive to do the right things in the right way. We act in accordance with our core values and principles while following all legal and compliance standards. Together with our core values and our leadership principles, this Code of Conduct forms the framework in which we operate.

This document contains what we all have to live up to – the Executive Board as well as all managers and each and every employee. The Code of Conduct supports us in our everyday business by prescribing binding rules and describing how we can deal with challenging situations.

Please read this Code of Conduct and we encourage you to discuss the examples with your colleagues.

Should you have any questions please do not hesitate to contact the functions listed in the Support chapter of this Code of Conduct.

[Link to Scania Executive Board](#)

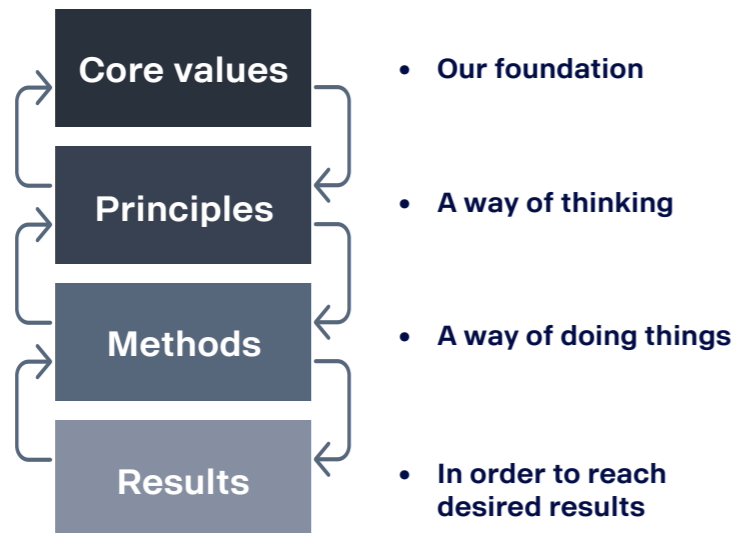
# THE SCANIA WAY

## Our Operational Strategy – The Scania Way

Scania’s aim is to drive the shift towards a sustainable transport system, creating a world of mobility that is better for business, society and the environment. Our operational strategy – The Scania Way – describes how we want the Scania organisation and our processes to work and how we want the people to think.

The Scania Way gives us the ability to execute our mission with our sound company culture as its foundation. This foundation is based on our core values and a leadership enabling the dedicated and empowered people of Scania to grow to their full potential.

## THE THINKING MODEL



The Thinking Model helps us connect the core values, the principles and our way of working with the results we get. These connections apply in both directions. Here leadership comes into play, yielding the way for the dedicated people of Scania, working in cross-functional teams.

An important symbol of The Scania Way is the Scania House. The house has a foundation representing our core values, and a floor, walls, and a roof representing our operational principles.

The Scania House together with the Thinking Model form the basis of our corporate culture. This is “The Scania Way”.

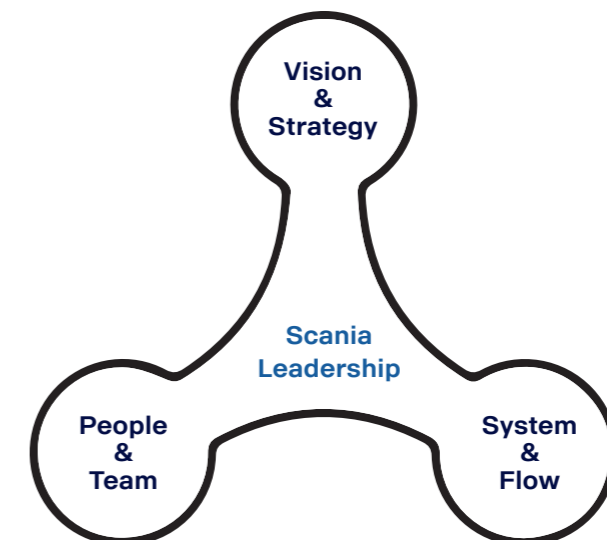
## THE SCANIA WAY

Leader in sustainable transport



## Scania Leadership

Leadership at Scania is part of The Scania Way. Leadership ties the different ends of the house and thinking model together. The leadership mission is to make sure we implement our strategy, run an efficient operation and continuously develop the teams and individuals within the enterprise. Only with these three areas in symbiosis, will we see high performing and continuously developing teams.



## OUR CORE VALUES

### CUSTOMER FIRST



Our current and potential future customers are the starting point of everything we do. Our understanding of our end customers' needs defines the value within our processes.

### RESPECT



We respect each individual. Everyone can contribute, has the right and obligation to be heard, and has the potential to grow and learn over time. Respect is the foundation of all processes, all improvements, and all value creation.

### TEAM SPIRIT



We work in teams towards a common goal, united by a shared purpose. A team includes everything from the smallest group of colleagues, through each brand, up to the TRATON GROUP itself and partners. We work together in a transparent way. And we show the same team spirit in every team.

### RESPONSIBILITY



We recognize that the TRATON GROUP is part of a greater society. We always act with integrity and look beyond our immediate areas of responsibility, considering the long-term impact of our actions. We take responsibility as a group and as individuals for the sustainability and development of the society and environment we are part of.

### ELIMINATION OF WASTE



The tireless work to identify and remove actions and activities that have no value to our end customers – that no one is prepared to pay for. This kind of waste can take many forms – overproduction, overprocessing, underprocessing, waiting, lack of collaboration, not using human potential, biases, and many others. Anything that adds unnecessary costs to a process is wasteful, and all waste is disrespectful toward the people working in our processes. We continuously work to minimize unnecessary cost by eliminating waste.





## WE ARE ONE: OUR FUNDAMENTALS FOR INTEGRITY AND COMPLIANCE

The Scania Code of Conduct is the ethical and values-based foundation for acting with integrity and in compliance with the corporate governance framework in Scania. It serves as a binding framework for all employees of all functions in all Scania companies — all over the world.

Together, we take responsibility for our workplace, as well as for Scania's impact on the environment and society as a whole. We treat each other with respect and fairness, as equals. We are committed and courageous, and we stand up for our values and principles — regardless of economic, social or time pressure.

We are firmly convinced that it is essential for each and every one of us — employees, members of the Executive Board, and managers — to act with integrity and in good faith in order to foster trust in our company, our products, services, and innovations. That is why the decisions we take in all areas of work and in all roles must be in accordance with our core values and comply with applicable national and international laws, regulations, and internal voluntary commitments. This also holds true for the continued evolution of our company as well as the selection, procurement, development, and use of innovative technologies such as artificial intelligence.

It also shapes how we bring value to our customers through our products and services. Transparency is important to us, and our approach to innovative technologies ensures that users' rights and security are respected.

Each of us is personally responsible for complying with the Scania Code of Conduct. It is up to all of us to familiarise ourselves with the Code of Conduct's principles and to be guided by them in our day-to-day decision-making for the protection of people and the company, the environment, and for future generations.

We do not tolerate violations of the Code of Conduct. Anyone who violates the Code of Conduct must expect consequences. To make sure that violations do not occur, we seek advice and support from our colleagues, managers, and the contacts defined in the Support chapter of this Code of Conduct, so that together, we can protect our Company, its values, and the reputation of our brand.

# WE ARE COMMITTED INDIVIDUALS

We embrace our core values, principles, and our corporate governance framework, thus promoting sincere and fair interaction with one another based on trust.

We are all role models.



## ETHICAL LEADERSHIP

We lead based on our values.

### Corporate principle

We embrace our core values, principles, and corporate governance framework. We take responsibility for both personal and corporate growth, and lead by example. We perform our duties and manage our powers and roles in an appropriate, fair, and responsible manner. This also applies to personal relationships in the workplace, in particular insofar as existing employment or hierarchical dependencies may be exploited. Our decisions are guided by integrity, show of good judgment, and are taken in the best interests of Scania and its employees, business partners, and shareholders. We strengthen the trust and shape change through our values-based leadership.

### My contribution

I am aware of my function as a role model both within Scania and in a broader context. My conduct and actions are guided by integrity and responsibility and based on this Code of Conduct as well as our core values, principles, and corporate governance framework. I advocate interpersonal interaction in a spirit of trust, honesty, and fairness, and I am open to different points of view.

### Example

*In order to complete a project to schedule, your team would like to skip one step in the process. They say the step is unnecessary.*

*You point out that the valid rules must be followed, regardless of any pressure. Together, you search for a solution that complies with the requirements and our core values. You undertake to revise the process in collaboration with everyone involved and, where possible, to make it leaner. You commit to that as a manager and team member.*



# HUMAN RIGHTS

## We take responsibility for human rights.

### Corporate principle

Respect for human rights is of vital importance. We are convinced that sustainable economic activity is only possible when we act ethically and with integrity. We are fully committed to our responsibility regarding human rights. Scania adheres to TRATON Policy Statement on Human Rights, which transparently reflects our commitment and describes which activities we have already implemented within Scania for the respect of human rights.

We confirm our commitment to international human rights laws and declarations, in particular the International Bill of Human Rights and the core labour standards of the International Labour Organization (ILO). We reject any involvement in war crimes, crimes against humanity, genocide, or other serious violations of international humanitarian law.

Our activities are based on the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, which determine the main cornerstones for our actions.

### My contribution

As a fundamental principle, I contribute to respecting human rights. I familiarize myself with the [TRATON Policy Statement on Human Rights](#). If I become aware of human rights impacts, I take action. This applies not only to cooperation within Scania but also to the conduct of and toward business partners. I refrain from any form of threats, intimidation, or attacks against human rights defenders or whistleblowers.

If I have concerns or receive indications of human rights impacts in my professional surroundings, I inform my manager or get in touch with any of the contacts listed in the chapter on "Support". Together we seek for solutions to prevent or stop and remediate them.

### Example

*Someone has informed you that one of our suppliers pays some of its employees below minimum wage, and is violating local labour law and Scania Supplier Code of Conduct by tolerating 80-hour working weeks.*

*Inform your manager and the Whistleblowing System of your concerns about human rights abuse. Scania will investigate the allegations in greater detail and take the necessary measures. This may include starting a dialogue with the respective supplier, using company leverage to reach certain agreements, and as a last resort terminating the business relationship with the supplier in question. Cases connected to Scania's supply chain are handled in the Supply Chain Grievance Mechanism.*





# DIVERSITY, EQUAL OPPORTUNITIES, AND EQUAL TREATMENT

## We live diversity.

### Corporate principle

Diversity, equity and inclusion, along with equal opportunities, and fair treatment are fundamental principles that underpin a just, non-discriminatory, and respectful coexistence. We firmly believe in collaboration based on the spirit of partnership, in fostering tolerance, and in upholding mutual respect. Our commitment extends to promoting diversity within our workforce and nurturing an inclusive work environment.

We are dedicated to being fair in everything we do. We make sure our decisions and actions are based on fair and valid reasons, treating everyone with equal respect and care. We don't allow unfair treatment, whether on reasons that are legally protected or not, but strive to avoid bias and prejudice. We work hard to make sure all our interactions and decisions show this commitment, whether it's to our colleagues or anyone else.

We value diversity, actively support including everyone, and work to create a workplace where every employee feels welcome and valued. We encourage everyone to participate and contribute, and we believe that respecting each person's uniqueness is good for our company.

We select, develop, and compensate our employees based on their qualifications, performance or their skills.

### My contribution

I observe the principles of diversity, equity, inclusion, equal opportunities, and fair treatment and encourage people around me to do the same.

If I see any violations of the principles of equal opportunities and equal treatment, such as harassment or bullying, I make the persons involved aware of their misconduct. If I am not in a position to directly influence events, I notify the People and Culture function of the incident immediately or get in touch with the contacts listed in the chapter on "Support".

### Example

*A colleague you know personally tells you that a candidate for a job was probably turned down because she wears a headscarf, even though she was the most qualified candidate for the job.*

*Help to clarify the situation by informing your manager or the relevant People and Culture function immediately, or report this conduct to the Whistleblowing System so that appropriate steps can be taken.*



# SPEAK UP

## We speak up when something is wrong.

### Corporate principle

We want to learn from mistakes and continuously improve. That is why we speak up about wrongdoings, or as soon as something does not feel right, even if it is awkward and uncomfortable. To enable this, we promote a culture of integrity and actively seek dialogue within our team and with our direct manager. We seek advice and support if we have questions and problems. We protect everyone who contributes to this culture.

For us, compliance with external and internal rules and regulations at all times is a given. We do not tolerate misconduct. We believe that turning a blind eye can never be the right solution. That is why we react immediately and appropriately to misconduct and violations of the law, internal policies, and in particular the Scania Code of Conduct.

Managers should lead by example through conduct that complies with our rules and regulations. They should perform this important function by supporting employees to comply with the rules, promoting a speak-up culture, and following up on violations.

### My contribution

In case of questions concerning reasonable suspicion of a violation of an internal or external regulation or misconduct, I seek advice from the relevant functions such as the Group Investigation Office, Group Compliance, People and Culture and the direct manager. I can check the Scania policy on Whistleblowing and Internal Investigation. The employee representatives are also available to provide support if needed during investigation. As an employee, I am encouraged to report any reasonable suspicions of regulatory violations via the Scania Whistleblowing System. As a manager, I have the obligation to report immediately any reasonable suspicions of serious regulatory violations.

### Example

*You notice that a manager signs off invoices from a business partner where his wife is a managing director. The manager has not reported this conflict of interest. In fact, he plans to expand business relations.*

*It is important to avoid even the impression of a conflict of interest and to disclose any apparent or actual conflict of interest to your manager and the relevant People and Culture function immediately. Transparency is the only way to reconcile personal interests with those of the company.*

*If you notice possible misconduct, speak up and inform the Group Investigation Office immediately or make a report to the Scania Whistleblowing System.*



# EMPLOYEE REPRESENTATION

**We work together in close partnership — constructive, cooperative, and fair.**

We respect the freedom of association and collective bargaining. We recognize the basic right of all employees freely to organize themselves and pursue employee representation.

We are committed to working with employee representatives in good faith according to Scania core values and Scania labour relations principles:

- **Early involvement** - Labour representation should be involved at an early stage in the decision-making processes, so that their viewpoints can be integrated into the process.
- **Mutual trust and pragmatism** - Cooperation should be based on mutual trust and shared responsibility, be pragmatic and focus on problem solving.
- **Shared responsibility and equality** - Working together is a success factor for Scania. The assumption should be that management and labour representatives are equal partners with shared responsibility for joint decisions.
- **Joint communication** - Decisions should be communicated by the parties jointly, where possible.

The goal is to conduct a constructive and cooperative dialogue, and to strive for a fair balance of interests. Professional dealings with employee representatives are part of our corporate culture.

Safeguarding the future of Scania and its employees is achieved in a spirit of cooperative conflict management and social commitment, on the basis and with the goal of ensuring economic and technological competitiveness. Economic efficiency and job protection are equal-ranking and shared goals.

# WE ARE RELIABLE COLLEAGUES

We take our responsibility in the workplace seriously and protect what is valuable for our team, Scania, and our customers.

## SAFETY AND HEALTH AT SCANIA

**We preserve and promote safety, health and well-being at work.**

### **Corporate principle**

We take our responsibility for the safety and health of our employees very seriously. We preserve and promote safety, health and well-being at work in line with legal and internal requirements.

Safety and health of all employees is a top priority and fundamental to ensuring a sustainable future for Scania and to positioning Scania as an attractive employer. We therefore aim to ensure safety, health and well-being at work. This requires the cooperation and participation of all.

### **My contribution**

I comply with safety and health requirements and instructions. I do not endanger my own safety and health or that of my team or third parties. I understand the importance of safety and health rules and I support my colleagues to work in a sustainable and safe way. I take action in order to avoid ill-health and accidents. I do not look the other way, and I accept help.

Within my area of responsibility, I take all appropriate and statutory measures to ensure a safe and healthy work environment. I draw attention to unhealthy and unsafe actions or conditions. I attend relevant trainings and follow the instructions.

### **Example 1**

*You notice that a device in your department appears to have an electric defect.*

*Do not activate the device and notify the responsible manager to coordinate further measures. You are not permitted to repair electric equipment yourself because this might be dangerous.*

### **Example 2**

*You notice that the project you are working on has an unreasonable schedule. In addition, responsibilities and roles are not clearly described.*

*You ask for a meeting with the responsible manager and project manager to point out that there is a risk of ill health within the project.*



# HANDLING COMPANY ASSETS

**We protect our assets — whether visible or invisible.**

**Corporate principle**

We respect Scania's tangible and intangible assets and do not use them for non-business purposes, but solely to achieve Scania's business objectives. Exceptions are possible if internal policies and guidelines permit private use.

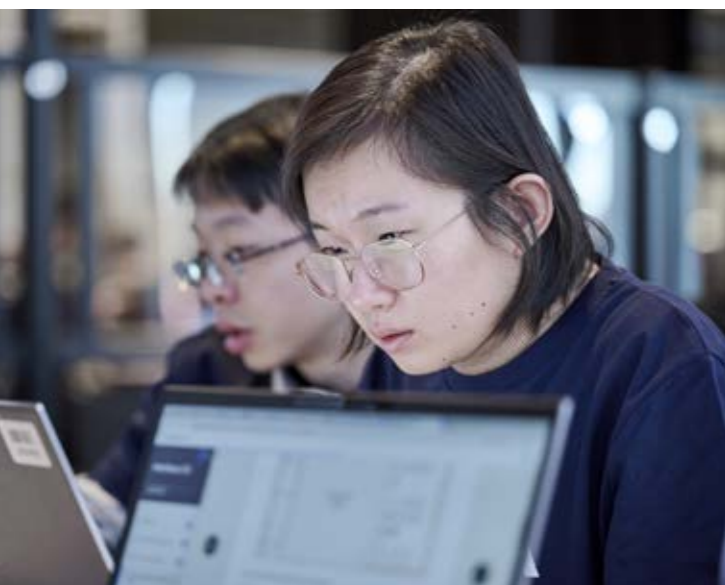
**My contribution**

I adhere to Scania's rules and exercise care when handling Company assets.

**Example**

*High-end software is installed on your business laptop. A friend who knows this asks you to lend him your laptop so he can use one of these programs for private purposes.*

*You say no, because you know that Scania's property and Scania's IT cannot be made available to third parties.*



# SECURITY AND PROTECTION OF INFORMATION, KNOW-HOW, AND INTELLECTUAL PROPERTY

## We protect information and intellectual property.

### Corporate principle

We are aware of the value of Scania's know-how and take great care to protect it. We respect the intellectual property of competitors, business partners, and other third parties.

### My contribution

I handle all Scania information carefully and do not disclose it to unauthorized persons. I take particular care with regard to information relating to technical know-how, patents, and trade and business secrets.

### Example

*Your technical invention is about to go into series production. You think about telling a colleague about this when you meet on the train on the way home.*

*Be aware that ideas and patents are also intellectual property belonging to the Company and do not discuss them in public. If you have any concerns, contact your manager or the relevant department.*



# WE ARE RESPONSIBLE PARTNERS

Trust is our greatest asset.  
That is why we rely on honest, reliable,  
transparent, and fair business relationships.



## PROHIBITION OF CORRUPTION

**We do not bribe others and do not accept bribes ourselves, and we refrain from engaging in any type of corruption.**

### Corporate principle

We do not tolerate corruption.

Corruption means that someone abuses their professional position to gain an advantage for themselves or a third party and thereby harm others.

We conduct business lawfully with our business partners, customers or other external third parties only within the permissible legal framework and in line with existing internal rules. We must never accept, offer, promise to make or make payment or provide anything else of value directly or indirectly to influence the placement of contracts, obtain a business advantage, secure political or business concessions.

### My contribution

I refrain from engaging in any transaction or activity involving corruption of any kind. I keep myself informed by checking internal rules and/or consulting internal experts. If I receive any indications of corruption, or if I need help or advice I immediately inform one of the contacts listed in the chapter on "Support". If I need help or advice, I act immediately.

### Example

*You work in software development, and you are asked to award a major sub-project to an external service provider. One of the service providers that have been invited to submit a bid offers you a large sum of money if you make sure their company gets the contract.*

*The conduct of the service provider constitutes attempted corruption. Clearly decline the money and inform your manager or the Group Compliance function immediately.*



# BENEFITS

## We carefully check all benefits.

### Corporate principle

Our products and services define who we are. Therefore, benefits such as gifts, hospitality, and invitations to events are only permitted if they are appropriate.

Our internal policies set out what benefits are appropriate and what steps must be taken when accepting and/or granting them.

### My contribution

I familiarize myself with the policies on handling gifts, hospitality, and invitations to events, and strictly abide by them.

I check whether my behaviour is appropriate and whether it might influence my business decisions.

### Example

*An employee from a service provider gives you a gift.*

*Consult the applicable policy on benefits to check whether the gift is appropriate. If in doubt, consult your manager. There is a mandatory obligation to notify your manager with regard to accepting a gift if the value of the gift exceeds the value as defined in the applicable policy or if it may be inappropriate for any other reason.*



# DONATIONS, SPONSORING, AND CHARITY

**We contribute to society in accordance with laws and internal rules.**

## **Corporate principle**

We make donations, i.e., voluntary contributions with no expectation of consideration in return by the recipient, and grant sponsorships, i.e., contributions based on a contractually agreed consideration, to contribute to society and achieve a positive impact for our reputation and public perception. In order to avoid conflicts of interest and to ensure standard conduct within Scania, donations and sponsoring measures are permitted only in the context of the respective legal framework and in accordance with the applicable internal rules.

Donations and sponsoring measures are only granted in accordance with a transparent approval process. We grant monetary donations and donations in kind to support the following areas: science, research, education, welfare, culture, and sustainability. In addition, sponsoring measures are also admissible for the areas of sport and the industry.

## **My contribution**

If I consider a particular sponsoring measure by Scania to be worthy of support, I make initial contact with the appropriate functions, e.g., Communications, Group Compliance, and People and Culture.

The granting of donations must be transparent, i.e., the purpose, the recipient of the donation, and the financial management must be documented and verified. I comply with internal processes and general conditions and do not initiate any donation that could damage the reputation of Scania.

## **Example**

*A local politician asks you for a donation from Scania for the election campaign.*

*Turn down the request. Donations may only be granted after going through the required approval process. In this specific case, the donation cannot be approved because our internal guideline prohibits donations to political parties, related institutions, and politicians.*



# DEALINGS WITH PUBLIC OFFICIALS

**We exercise caution when dealing with public officials.**

## **Corporate principle**

In view of national and international legislation, there is an increased risk of corruption when dealing with public officials or holders of political office, governments, authorities, and other public institutions. This is taken into account in our internal policies, which lay down the framework for dealing with public officials, in particular related to benefits and conflicts of interest. We do not make any facilitation or expediting payments. Such payments are sums paid to public officials to accelerate routine administration matters.

## **Example**

*You are the company's representative for the handling of import licenses with the customs authorities. A customs official provides support during the entire process. Once the formalities have been completed, you would like to express your appreciation with an appropriate business gift.*

*Irrespective of their appropriateness, refrain from granting benefits to public officials for the provision of services by them.*

## **My contribution**

I am aware that there is an increased risk of corruption when dealing with public officials. Therefore, I familiarize myself with the applicable special rules. I understand that I have a binding obligation to consult the Group Compliance function in case of benefits granted to public officials.



# BUSINESS PARTNERS, PROCUREMENT, AND SALES

**We carefully check who we do business with.**

## **Corporate principle**

We carefully select sales intermediaries, suppliers, service providers, and other partner companies based on objective criteria and make use of competition. We only cooperate with business partners in line with statutory requirements, internal rules, and guidelines.

We check the integrity of potential business partners carefully before entering into business relationships, and follow the engagement and payment procedures set out in our policies and regulations.

When purchasing or selling products and services, we involve the relevant departments in the process in good time in accordance with the applicable policies.

## **My contribution**

I ensure that the integrity of potential business partners has been checked before entering into business relationships. I show no bias in favour of a supplier, service provider, or partner company without an objective reason, and I encourage competition.

I do not purchase any products or services without having first gathered information on the market and alternative suppliers. I follow the applicable procurement processes and involve the relevant purchasing function at an early stage before the planned delivery and performance of services in line with valid purchasing processes.

I make sure that remuneration is only paid for services that are actually rendered and that the payments are commensurate with the services rendered in order to rule out corruption risks.

## **Example**

*It comes to your attention that a colleague would like to commission a supplier without involving the responsible purchasing function as required by the applicable procurement principles.*

*Notify your colleague about the correct process to make sure that the colleague reach out to the responsible purchasing function department, in order to ensure that the best offer from an overall company perspective is selected and required due diligence checks are conducted.*



# CONFLICTS OF INTEREST

**We take decisions based on facts, thus avoiding conflicts of interest.**

## **Corporate principle**

We act with integrity. That is why it is especially important for us to avoid creating potential conflicts of interest when performing our job responsibilities and to recognize and disclose possible conflicts that we face or observe. A conflict of interest exists if private or personal interests of employees influence or could influence their business decisions. This also applies to personal relationships in the workplace, in particular with regard to employment relationships with hierarchical dependence or influence.

Conflicts of interest may arise both from employees themselves or through persons related to them, in particular as a result of involvement in other companies, through secondary employment, in connection with memberships or with regard to employees' personal financial circumstances. In this context, private relationships with business partners, such as suppliers, could also create a conflict of interest.

## **My contribution**

If I face or suspect that I may face a potential conflict of interest, I immediately disclose the facts to my manager and consult with the relevant People and Culture and the Group Compliance functions, if needed. If a conflict exists, we jointly seek a solution that safeguards the interests of Scania and document it.

## **Example**

*Your manager asks you to check bids from several IT consultancy firms. You discover that one of the most favourable bids comes from a company owned by a good friend.*

*Inform your manager of the situation, document the possible conflict of interest, and withdraw from the decision-making process to avoid any appearance of a conflict of interest.*

# PROHIBITION OF INSIDER TRADING

## We do not share insider knowledge.

### Corporate principle

We handle information pertaining to Scania's share performance in accordance with capital market requirements and do not tolerate any insider trading. Inside information is information of a precise nature that has not been made public and that, if it were made public, would be likely to have a significant effect on the price of the relevant financial instrument, e.g., stocks and shares. We may only use knowledge relating to insider-relevant projects and processes internally in accordance with the applicable internal policies and may not divulge such knowledge to any outside party, including family members, e.g., a spouse.

### My contribution

I do not engage in insider trading, nor do I make any such recommendations to any third party or instigate any third party to engage in insider trading. Furthermore, I do not divulge inside information unless this is required in the course of my normal work, and I comply with the relevant internal policies. I undertake to familiarize myself with the applicable internal rules.

If I have access to inside information, I do not purchase or sell any financial instruments based on this information. This applies not only to trading shares in listed companies belonging to the Scania and TRATON Group or derivatives thereof, but also to trading financial instruments in general, i.e., also those of suppliers.

### Example

*You work in your company's accounting department. A friend who has often bought shares in the company you work for asks you if you can give him the quarterly figures, even though they are potentially insider-relevant and have not yet been published.*

*Do not give your friend the information he has requested under any circumstances. This information may be inside information and you may not share this information with other people for any reason whatsoever. You would be liable to prosecution if you were to pass on this information directly or indirectly.*



# PROHIBITION OF MONEY LAUNDERING AND TERRORISM FINANCING

**We are committed to clean business practices.**

## **Corporate principle**

Laws against money laundering and terrorism financing are in place in almost all countries worldwide. Money laundering occurs when funds or other assets originating directly or indirectly from criminal offenses are put into circulation in the economy, eventually making their source appear legal. Terrorism financing occurs when money or other resources are made available to commit criminal acts of terrorism or to support terrorist organisations. We carefully check the identity of customers, business partners, and other third parties with whom we wish to do business. We check for red flags that may indicate money laundering and perform appropriate follow-up measures when a red flag or suspicious transaction is identified. We do not accept any involvement or participation in any illicit financial flows and take responsible actions to avoid this. We also comply with all applicable laws and regulations on money laundering and terrorism financing.

## **My contribution**

I take no action whatsoever that may violate money laundering provisions at home or abroad. I am vigilant and immediately assess any suspicious conduct on the part of customers, business partners, and other third parties. I follow internal policies and routines and if I see something, I take action. If I need help, I ask the responsible contact persons listed in the chapter on "Support".

## **Example**

*A customer or business partner has overpaid and asks for the excess amount to be repaid to an account held in another country or in cash instead of via bank transfer to the original business account.*

*This kind of request requires an explanation. Do not accept the suggestion readily but ask the customer why the amount cannot be repaid through the same channel used for the original payment. Seek advice from the contact person responsible for money laundering prevention.*

# FAIR AND FREE COMPETITION

## We are committed to fair and free competition.

### Corporate principle

Fair and free competition is protected by competition laws valid throughout the world. Complying with these legislations ensures that there is no undue distortion of competition in the relevant markets and benefits all market players. Not only does anti-competitive conduct have the potential to significantly damage the good reputation of Scania, it can also incur severe fines, penalties, and financial compensation for damages. In particular, agreements and concerted practices between competitors intended to achieve or effect the prevention or restriction of free competition are prohibited.

We do not enter into any anti-competitive agreements with competitors, suppliers, or customers. This includes the exchange of competitively sensitive information, such as prices and price components, terms and conditions as well as carving up customer groupings and territories, and restrictions on innovation.

If Scania holds a dominant market position, we do not abuse this position. We also take care in properly implementing merger control procedures required with regard to cooperation and transactions.

We comply with the specific antitrust provisions for distribution systems in our dealings with our authorized distribution partners.

### My contribution

Whenever I come into contact with competitors, I make sure that no information is given or received that would allow conclusions to be drawn about current or future business conduct.

In discussions or any other forms of contact with competitors, I avoid issues that could be of relevance for the competition among each other.

If I ever encounter a forum where anti-competitive discussions are taking place, I act immediately in line with internal policies and processes.

### Example

*You talk to a competitor's employee at a trade fair. After a short while, you notice you are being sounded out for information about future business planning. In return, the employee offers to divulge the same information about his company.*

*Make it absolutely clear to the competitor's employee immediately that you will not talk to him about such issues. This type of conversation — apart from the unauthorized disclosure of trade secrets — is also a violation of valid competition and antitrust legislation and could have drastic consequences for you personally, the Scania Group, and both the competitor's employee and his company. Document this conversation and inform the Legal and Compliance function immediately.*



# ACCOUNTING AND REPORTING

**We are committed to correct accounting and reporting.**

## **Corporate Principle**

Our business depends on trust. We strictly comply with the statutory provisions for proper accounting as well as financial and nonfinancial reporting. Transparency and correctness are our top priorities, because any irregularities may have serious consequences for Scania as well as for the persons responsible. To that end, we regularly inform all relevant stakeholders of our business developments. We publish our financial and non-financial statements for the period in question on time in accordance with national and international reporting regulations.

## **Example**

*You urgently need new equipment. However, your department's budget for the current fiscal year has already been used up. You consider acquiring the equipment anyway and posting the cost in the next fiscal year when your budget has been refreshed.*

*Do not take any such action. Entries must always be assigned correctly. Posting entries inaccurately may have serious consequences for Scania and for you as an employee.*

## **My Contribution**

In my area of responsibility, I organize processes to ensure that all business financial and nonfinancial data is entered correctly and promptly in the accounting and reporting system. If I have any questions about the correct recording of data, I contact my manager or the appropriate department.





# EXPORT CONTROL

**We are committed to ensure compliance with all applicable export controls and sanctions regulations.**

## **Corporate Principle**

We are aware of our responsibility to fulfil export control and sanctions obligations and expressly commit to complying with the relevant legislation.

Cross-border business processes and transactions may be subject to prohibitions, restrictions, approval requirements, or other supervisory measures under export controls and sanctions. These may relate to the relevant business partners, goods, countries, financial resources, or intended use. This applies to technologies and software as well as goods and products. In addition, it applies to temporary cross-border transfer and technical transmissions, for example, by e-mail or cloud. Furthermore, certain imports may be subject to export control regulations.

We ensure compliance with applicable export control regulations and the relevant internal policies.

## **My Contribution**

I am responsible for carrying out the relevant processes and activities in compliance with export controls and sanctions. I keep myself up to date with policies and procedures on export controls and sanctions. When I need help in my day-to-day work, I get back to my unit's export control function.

Should I become aware of export control regulations being violated in my area of responsibility, I will immediately inform the Group Export Control function and contribute to remedy such violations and to prevent them from occurring again in the future.

## **Example**

*You would like to enter into a business relationship with a potential customer who might be on a sanctions list.*

*Make sure you comply with valid legislation. Contact your unit's Export Control function to coordinate the next steps.*

# WE ARE GOOD CORPORATE CITIZENS

We take responsibility for society and ensure that Scania contributes to sustainable development.



# COMMUNICATION AND MARKETING

## We communicate clearly and respectfully.

### Corporate Principle

We ensure that our communication is clear and consistent in order to maintain the confidence of customers, employees, investors and other stakeholders. Before committing to and/or executing any communication or marketing measures, such measures must be coordinated with the relevant department. Thoughtfulness and respectful interaction with one another are second nature to us.

### My Contribution

I do not issue any public statement on behalf of Scania if I'm not appointed as a public spokesperson, and always refer any inquiries to the Scania Press and Media at the Communications function. If I make any comments at public, trade, or cultural events or on the Internet, I make it clear that I am voicing solely my personal opinion. I consult Scania's social media guidelines for advice on proper conduct in social networks.

### Example

*A Scania employee has made comments to the media about product sales from another TRATON Group brand. This gives the impression that the employee is speaking for the brand in an official capacity.*

*Contact the employee and explain that official comments about Scania and its products as well as another TRATON Group brand and its products can only be made by authorized units. Forward the comments to the relevant unit with a request to check whether a public response is necessary.*



# POLITICAL LOBBYING

**We represent our Company's positions in a responsible and clear way.**

## **Corporate Principle**

As a member of society, we can specifically promote Scania's positions during decision-making processes, such as those for legislation plans for the transformation of our industry, through political lobbying. We conduct lobbying centrally and in line with the principles of openness, accountability, and responsibility. To this end, political legislative processes that have an influence on our business model and on the transformation of the transport industry are accompanied critically and constructively. Undue influence on political decision makers or on legislation, which violates the law or our own principles, is not accepted and tolerated.

## **Example**

*You have a relative who works for the transport ministry and who asks for your opinion on draft legislation that will impact the automotive industry. He also asks you for Scania's position on this legislation.*

*Do not comment. Political lobbying in Scania is always coordinated centrally and conducted openly and transparently. The authorized contact for such lobbying activities is the Public Affairs at Communications function.*

## **My Contribution**

I do not attempt to intervene in political decisions on behalf of Scania if I am not authorized to do so. If I am authorized to do so, I observe the relevant internal policies in the performance of my duties.



# TAXES AND CUSTOMS

## We comply with tax and customs regulations.

### Corporate Principle

As a global company, we are aware of our responsibility to meet our obligations with regard to foreign trade, taxes, and customs, and we explicitly comply with national and international legislation. All material relevant tax laws, regulations and rules are obeyed, as well as reporting duties and disclosure requirements are fulfilled. All material taxes and levies are filed and paid in time.

### My Contribution

In my area of responsibility, I design internal structures and processes to ensure that the taxes and customs to be paid by the respective Scania Group companies are calculated correctly, promptly, and in full, are disclosed in reporting, and are paid to the relevant fiscal authorities.

If I have information concerning a violation of tax and customs regulations in my area of responsibility, I undertake every action I can to prevent or stop this violation. If that is not possible, I seek advice from the relevant Tax and Customs function.

### Example

*You are responsible for posting certain business transactions, for example general overheads such as maintenance expenses, and production costs, in the statutory financial statements. One project exceeds certain controlling parameters early on in the fiscal year. You therefore receive instructions to make an entry under maintenance expenses, even though the transaction unquestionably relates to an investment and must therefore be treated as capitalized production costs.*

*Post the entry in line with legal requirements. All business transactions must be correctly reported pursuant to commercial law and tax regulations because these accounting records form the basis for tax returns. Accounting errors could therefore result in incorrect tax returns and lead to serious consequences under tax and customs law for Scania and the employees responsible.*





# DATA PROTECTION

**We handle personal data in a respectful and compliant way.**

## **Corporate Principle**

When living the core value “Respect” we respect the privacy of people. We attach great importance to handling data responsibly, securely, and transparently. We process, which includes e.g. collect, use, share and store, personal data in accordance with legal provisions. We protect all personal data that we process regardless of it belonging to customers, drivers, employees —including former employees and applicants, partners such as suppliers , members of the public etc.

## **My Contribution**

I am responsible for handling personal data in accordance with applicable legislations and internal policies and guidelines. I integrate data protection in my daily work and ensure that it is embedded from the ground up in processes, products and services. My responsibilities may include registration of personal data processing, being transparent versus the data subjects, ensuring security of personal data handling, immediately acting on suspected personal data breaches etc. If in doubt, I contact my manager or the relevant data protection function.

## **Example**

*You have organized a seminar with external participants and receive personal data in connection with the seminar. A colleague asks you to pass on the addresses in order to send the participants commercial communication on our products and services.*

*Do not pass this data on without first consulting available guidance material on Reflex or contacting the Group Data Protection function. As a general principle, personal data may only be processed for the purpose for which it was initially collected.*



# IT SECURITY

## We secure our IT systems.

### Corporate Principle

We respect IT security and abide by the applicable information security regulations. The information security regulations provide guidelines for all employees.

### My Contribution

I familiarize myself with the applicable information security regulations and observe the rules therein. As part of the information security awareness, I make my active contribution by being vigilant at all times and ensuring that my basic IT security skills are always up-to-date.

### Example

*You receive an e-mail requesting you to press on a link and type in your password, you did not expect this e-mail and you suspect this to be a phishing e-mail where someone is trying to trick you to reveal your password.*

*You report this according to local instructions as potential phishing e-mail so it can be investigated and potentially blocked. Never open attachments that appear to be suspicious or that come from unknown e-mail addresses.*



## PRODUCT COMPLIANCE

**We take pride in making sure our products lead the industry.**

### Corporate Principle

Countless people come into contact with our products and services on a daily basis. We give high priority to the conformity and safety of our products. We are responsible for ensuring that risks to health, safety, the environment, and the assets of our customers or third parties resulting from the use of these products are excluded where possible.

In compliance with statutory provisions, we develop our products in accordance with state-of-the-art technology, taking account of other binding obligations such as additional safety or climate-based requirements resulting from the latest scientific knowledge. This is systematically ensured by means of established structures and stable processes. Once they have been put on the market, our products are monitored in the field so that appropriate measures can be promptly initiated in the event of possible discrepancies. We do not make any compromises in this regard.

### My Contribution

I carefully comply with all relevant provisions in my day-to-day work. I set realistic goals. If there is a conflict of goals, the conformity of our products always has top priority, regardless of time or cost pressure. That is why I embrace our defined processes and continuously improve them. I work together with my colleagues to identify and close gaps in processes in order to meet all binding obligations. I contact my manager or the Product Compliance team if I have any questions or concerns about product compliance.

### Example

*A customer contacts you to report a technical problem with a product. You are not sure whether the problem is due to an operating mistake on the customer's part, but you cannot definitively rule out a manufacturing or construction defect.*

*Follow the applicable processes to clarify the issue and report the problem immediately to the employees in charge.*





# ENVIRONMENTAL PROTECTION

## We take responsibility for the environment.

### Corporate Principle

As a global commercial enterprise, we take responsibility for the environmental compatibility and sustainability of our products, locations, and services. Our Company aspires to be a global provider of sustainable mobility and a role model for protecting the environment. We focus on advanced and efficient technologies for reducing our environmental footprint, which we implement throughout the entire lifecycle of our products. From the very early phases of development and production onward, we make sure we manage natural resources carefully, continuously reduce the environmental impact, and comply with environmental protection laws and regulations. We are committed to decarbonization throughout our entire value chain and across all relevant scopes. We avoid harmful soil modification, water pollution, air pollution, harmful noise emission, or excessive water consumption.

Furthermore, we constantly reassess the environmental compatibility of our products and manufacturing processes, optimizing these where necessary.

We are a responsible member of society and a partner for politics. We seek dialogue with these players on future mobility concepts and on shaping ecologically sustainable development.

### My Contribution

I am mindful of environmental protection in my work and use resources and energy economically and efficiently. I make sure my activities have the smallest possible impact on the environment and that they comply with environmental protection laws and regulations. I draw attention to unsafe actions or conditions.

### Example

*You notice that the projector or other electric devices in the office are always switched on even though they are not in constant use.*

*Switch off the projector or other electric devices after use and talk to the team about the sustainable use of electronic equipment and resources.*

# ARTIFICIAL INTELLIGENCE ETHICS

## Corporate Principle

We acknowledge the benefits of using artificial intelligence (AI) but ensure that the rights and freedoms of individuals, including our own employees, are respected prior to deciding on the use of AI. We enable safe and secure handling and usage of AI systems by identifying potential risks, not only to the individuals but also to society, the environment and our products, and by addressing them through appropriate measures. We always respect Intellectual Property rights and are transparent about where, for what purpose and how AI is used in our work and in our products and services.

## My Contribution

When I develop, or order development of, services based on AI, I pay extra attention to only using balanced input data to avoid bias and discrimination. I make sure the AI system is robust and resilient against attack to alter its functioning. I also ensure transparency and explainability as well as enable human oversight and accountability.

When I use AI in my daily work I respect and enable the protection of data, including that I do not share personal data or sensitive Scania information with external AI tools, unless proper assessments are performed. When I use AI tools to generate material (text, picture, code etc.) I make sure vendor instructions and Scania guidelines/instructions are adhered to.

## Example

*A chatbot feature based on generative AI is offered as part of a new system you are about to acquire. The chatbot is compelling as it allows automated handling of many customer requests and questions, increasing response time and reducing the load on customer service desk. Before including the chatbot, you carefully analyze its features and understand how it operates, what data it uses, both personal data and Scania information, and what intended use the vendor has for it. You perform appropriate risk assessments covering risks to both customers who interact with the chatbot and employees who work at the customer service desk. You make sure that output provided by the chatbot can be explained. You are transparent towards the users of the chatbot, making sure they know they interact with AI and you provide them with an alternative for human intervention.*

The „Volkswagen Group Ethical Principles for AI” constitute the ethical guidelines for the procurement, development, provision and application of artificial intelligence for the Volkswagen Group. They are divided into three guiding principles, which are supported by nine commitments.

### 1. GUIDING PRINCIPLE 1 – RESPECT:

We respect the privacy and self-determination rights of our users and customers as well as our employees, and ensure that they are respected before deciding on the use of artificial intelligence:

- Our AI systems are in line with our values in diversity and fairness.
- Our commitments to society and human rights apply.
- Our AI systems are in line with our efforts for sustainability and the environment.
- We respect human labor with careful and complementary introduction of AI systems.

### 2. GUIDING PRINCIPLE 2 – SAFETY:

We enable our users and customers as well as our employees to safely handle and use AI systems by identifying potential risks and addressing them through appropriate measures:

- Our goal is to ensure safety and technical robustness through clear and measurable criteria.
- We enable human oversight and accountability.
- We respect and enable the protection of data within AI systems.

### 3. GUIDING PRINCIPLE 3 – TRANSPARENCY:

We want to create transparency about where and for what purpose artificial intelligence is used in our products and services. In this way, we want to make it clear what artificial intelligence can and cannot do in a specific application:

- It is our aim to make the usage and purpose of AI transparent.

# SUPPORT

## We offer support in understanding and implementing the Code of Conduct.

Our first point of contact for any questions or uncertainties regarding the Code of Conduct is our manager. In addition, every employee can contact the Group Compliance function at [compliance@scania.com](mailto:compliance@scania.com)

Apart from that, we can also approach further internal contacts like the People and Culture function, our employee representatives or the relevant expert function.

### Preventing misconduct, points of contact, and the Whistleblowing System

Our Code of Conduct provides the binding framework for acting with integrity and in compliance with the rules within Scania. As Scania employees, we have a responsibility to respect the principles of our Code of Conduct in order to prevent regulatory violations and thus avoid damage to the Scania Group, its employees, and third parties. Violations of the law, Scania's policies but in particular of the Scania Code of Conduct are investigated. Depending on the seriousness of the violation, this can have disciplinary, civil, or criminal consequences for the employees concerned. Proven misconduct might have an impact on remuneration. That is why we talk to our manager or seek expert advice immediately if we have any questions or concerns, or if we suspect there has been a violation of internal or external regulations. We should provide all information concerning such violations to the whistleblowing channels, such as the Group Investigation Office or at least to one of the following contacts: our line manager, the Group Compliance, Group Internal Audit, Corporate Security and the local or regional contact person.

In addition, we can submit reports on regulatory violations via the Scania Whistleblowing System. We can give our name, or we can make the report anonymously. We are aware that the Scania Whistleblowing System has responsibility for investigating reports of regulatory violations.

Regulatory violations are all intentional or negligent violations of regulations of applicable law or internal company regulations (especially violations of the Scania Code of Conduct or obligations under the employment contract) committed by employees in connection with, or based upon, their employment by Scania.

Managers have a special function as role models. The decisions they make for Scania must always take account of values and regulations. This includes immediately reporting reasonable suspicion of a serious regulatory violation.

The purpose of the Whistleblowing System is to protect Scania, the whistleblower, and all persons who contribute to investigating and putting an end to the misconduct. Discrimination against them is itself considered a serious regulatory violation.

At the same time, the Whistleblowing System protects the interests of the persons concerned. For them, the presumption of innocence applies as long as a violation is not proven. The work of the Whistleblowing System is based on uniform processes and the confidential, professional processing of reports. Abuse of the Whistleblowing System is not tolerated and will be disciplined accordingly.

Potential violations of the Code of Conduct for Suppliers and Independent Distributor Code of Conduct, including serious risks, violations of human rights, and environmental violations by direct and indirect suppliers and other business partners, can also be reported to the Group Investigation Office.

We can access the Whistleblowing System through the following channels:

**CONTACT DETAILS FOR THE GROUP INVESTIGATION OFFICE:**

E-mail: [whistleblower@scania.com](mailto:whistleblower@scania.com)

Postal address: SCANIA CV AB, Group Investigation Office, SE 151 87 Södertälje, Sweden

**CONTACT DETAILS FOR TRATON SE INVESTIGATION OFFICE:**

- Online reporting channel (this channel can also be used for making anonymous reports): <https://www.bkms-system.net/traton>

E-mail: [investigation-office@traton.com](mailto:investigation-office@traton.com)

Postal address: TRATON SE, TRATON Investigation Office, Hanauer Strasse 26, 80992 Munich, Germany

The relevant teams are available to talk to you in person, on the phone, or via email.

- Volkswagen 24/7 hotline: +800 444 46300 / +49 5361 946300
- In addition, Volkswagen AG has authorized two external lawyers (Ombudspersons) who can assist or ensure that hints are forwarded to the Group Investigation Office – per request also anonymously.

**CONTACT DETAILS FOR THE OMBUDSPERSONS:**

<https://www.ombudsmen-of-volkswagen.com>

Further information on the Scania Whistleblowing System and contact channels is available on our website at [Whistleblowing](#) | [Scania Group](#).

# SELF-TEST FOR DECISION GUIDANCE

If at any time I am unsure whether my behaviour complies with the principles set out in our Code of Conduct, I should ask myself the following questions:

1. Did I take all relevant matters into consideration and weigh them properly? (content test)
2. Am I confident that my decision is within the constraints of legal and company requirements? (legality test)
3. Do I stand by my decision when it is revealed? (supervisor test)
4. Am I in favour of all such cases being decided the same way companywide? (universality test)
5. Do I still think my decision is right when my company has to justify it in public? (public test)
6. Would I accept my own decision if I were affected? (involvement test)
7. What would my family say about my decision? (second opinion)

If my answer to questions 1– 6 is “yes” and the answer to question 7 is positive, my behaviour is very likely to be compliant with our principles. If questions remain unanswered or if I have any doubts, I should get in touch with any of the points of contact listed in this chapter.

